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ABSTRACT

How to plan and encourage congressional legislation for educational programs is discussed. The nature of policy statements, the need for longitudinal studies of effectiveness, the identification of purposes, and the capacities of various educational agencies to implement change are detailed as they relate to the requirements for congressional approval. Recommendations are made to the President and to Congress a) for improvements in policy formulations, b) for more flexible agencies to administer professional education programs, and c) for increased communications with the National Advisory Council on Education Professions Development concerning policy making in federal education. An appendix, which constitutes 60% of the document, expands on ideas set forth in the body of the report. (JB/CL)

windows to the bureaucracy

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I. THE IMPORTANCE OF POLICY

Former Presidential Counselor Daniel Patrick Moynihan wrote an article recently in which he took account of the limited outcomes from the extraordinary efforts to bring about social improvement in the last decade. In assessing the reasons for these less-than-hoped-for outcomes, Professor Moynihan concluded:

> . . . I believe one of the more important things is that the structure of American government, and the pragmatic tradition of American politics, too much defined public policy in forms of program, and in consequence has inhibited the development of true policy. In simpler times a simple programmatic approach was an efficient way to go about the public business. The problem comes with complexity. More specifically, the problem comes when society becomes ambitious and begins to seek to bring about significant changes in the operation of complex systems such as the society itself. There is nothing the least wrong with such ambitions. What is wrong is a pattern in which the ambitions are repeatedly proclaimed, and just as repeatedly frustrated -- especially when the source of frustration lies not in the malfeasance of individuals but in the limitations of the program approach to issues which demand the disciplined formulations and elaborations of public policy.[1]

One need not share Professor Moynihan's judgment about accomplishments of the sixties to concur with his view that

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1. Moynihan, Daniel P. "Policy vs. Program in the '70's." The Public Interest, (Summer 1970), pp. 90-100.

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the times "demand disciplined formulations and elaborations of public policy."

An Appraisal of Policies

We have recently examined the policies governing a number of Federal efforts designed to bring about improvements in the training and development of educational personnel. Our conclusions from this review are that the resources devoted to the formulation of policies are inadequate; the processes employed are primitive; and the results are unacceptable. Specifically, (1) in some important areas, policy statements needed to explain an agency's position simply do not exist; (2) where formal statements of policy are available, they often do not go beyond one-sentence assertions. Anything else must be gleaned from snippets found in program guidelines; comments made by agency heads during testimony before Congressional Committees; the brief text of budget justifications; speeches of government officials; instructions to those reviewing proposals; and other such disparate sources; (3) some policy statements are not informative, nor do they arise from any systematic analyses of issues.

Some examples which illustrate the limitations noted above will be found in the Appendix to this report.

It should be emphasized that this report is concerned, not with the merit of positions taken in any particular policies, but with the process of policy formulation and those general characteristics of policy which will serve to increase the prospect of effective action.

Policies of Effective Means

Policies governing educational effort by the Federal Government might usefully be classified on two levels. One concerns overriding national commitments or goals: universal education; equal educational opportunity; excellence in education; racial and social class integration in the schools; improvement in the qualifications of educational personnel; and like matters. The second level concerns actions taken to achieve these broad goals. It is the latter form which is the subject of this report.

Policies in this category are formulated to insure that the larger goals are achieved with the highest degree of effectiveness and with the greatest efficiency in the use of resources. For these reasons they may appropriately be labeled "policies of effective means."

Broadly defined, such policies would include a declaration which clearly communicates the ends and means developed by a Federal agency to implement legislation and a rationale by which these ends and means were determined.

In the Appendix we have expanded on this definition, outlining more specifically those factors which should be taken into account in formulating policies of effective means.

The Need for Policy Statements

That carefully delineated and rationalized policies are essential is evident from an examination of the following activities related to the achievement of educational goals:

Evaluation. Sensitive and revealing evaluation of the impact of Federal efforts in education is possible only if complete information about programs is available to those doing the evaluation. This is particularly important if evaluations are designed not only to establish whether a program is, or is not, successful, but also to shed light on why the program succeeded or failed. This latter function of evaluation has not received sufficient attention in appraisal of Federal activities in education.

Policy statements having the characteristics outlined in the Appendix (with particular emphasis on clarity of objectives and adequacy of rationale) are essential to meaningful evaluation.

Congressional Oversight. Congress has the responsibility of informing itself as to whether effective action is being taken in the execution of laws and whether funds are being spent wisely. The sum of the means now available (budget justifications, prepared statements by agency heads, program descriptions, results of evaluations) still leaves the Congress largely uninformed. This reporting system tends to stress what is being done. Needed is a frame of reference by which judgments can be made about the actions being taken by an agency. Such a frame of reference is the special contribution of policies of effective means.

Increasingly, Federal programs in education are being evaluated by determining whether there have been any demonstrable learning outcomes. For certain kinds of programs, among them those concerned with the training of educational personnel, it may be some years before such a determination can be made. A case in point is a program designed to

improve the training of teacher trainers. The training of a person in such a program may extend over three or four years. Personnel completing this training would then train teachers, taking another several years. Finally, two or three years of teaching would be required before the competence of the teacher, as measured by what the pupils learned, could be determined adequately. Thus, from eight to ten years could elapse from the time a new Federal program of this type was inaugurated to the point where effects on pupils could be established. In the interim, important decisions about appropriations and changes in legislation would be required. To enable the Congress to make sound judgments about programs in education during this intervening period, there must be an alternative for those methods of appraisal that provide evidence in the form of measured learning outcomes. Careful analysis of adequately prepared policy statements is one of the most effective ways of making such judgments.

Communication. State and local governments must be fully informed about Federal objectives and actions related to

the training of educational personnel. If they are not, duplication of effort, or voids, may result.

Those carrying out projects funded by the Federal Government also need the kind of information that would be included in policy statements. Not infrequently, project directors construe guidelines either too narrowly or too loosely. A thoughtfully developed rationale for Federal programs is needed if these misinterpretations of intent are to be avoided. Such a rationale is one of the important elements of a policy statement.

Sustained Effort. The turnover of personnel who direct Federal education activities is substantial. All too often, changes of personnel in the Executive Branch are accompanied by the promulgation of new priorities or the institution of new programs. This results in confusion and frustration on the part of those who direct projects in the schools or colleges. Federal efforts in education should be governed by policy, not by the inclinations of each new person assigned responsibility for an agency or a program. On occasion, changes in a course of action are inevitable, indeed desirable. But unnecessary changes will be kept to a minimum if policies are worked out thoroughly

when a program is inaugurated, and if those advocating a new direction are required to provide a rationale more compelling than that which governs existing practice.

Conditions For Improvement

The importance of policies of effective means and the limited extent to which such policies have been developed in connection with the training of educational personnel suggest the need for a markedly increased capability in this vital function of government. Among the conditions needed to assure this capability, we would include the following:

1. Character of Legislation. The nature of legislation has an important bearing on the degree to which sound policies are developed. The most creative response to Congressional intent will result if statutes related to the training of educational personnel identify broad purposes and accord to the Executive Branch the latitude needed to identify problems, develop strategies, and establish priorities. This kind of legislation provides agencies with the authority to take the initiative in developing policies appropriate to the varying needs of different classes of educational personnel.

It is important to emphasize that this kind of legislation, (which we would characterize as enabling rather than prescriptive), places a special burden on those responsible for its execution. The Congress must know how this latitude is being exercised. One of the most effective ways to respond to this need is by policy statements that make it clear that actions being taken by an agency are (1) consonant with legislative intent, and (2) based on the most careful assessment of training needs and the most comprehensive rationale for a course of action that effectively responds to those needs.

2. Capacity of the Agencies. Agencies must not only have the flexibility and authority to develop appropriate policies; they must have the capacity to do so.

To secure improvements in policy formulation related to the implementation of existing legislation, there must be sufficient personnel provided - at all levels of the Executive Branch - to do this job. While each level will bring to bear a special perspective, it is the program manager and those whose responsibilities include groups of programs who have - or should have - a unique grasp of the factors which enhance or block effectiveness. Particular

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attention should be paid to making sure that units at these levels are staffed, and are provided the time, to make a more significant contribution to policy-making than has been the case to date.

It is not difficult to see why policies of the sort we are advocating have not been developed: the administration of programs and the development of policies compete for the attention of the personnel who are responsible for these programs. It is administration which takes priority. Only the time and effort that remain after responding to the demands of managing a program are given over to policy.

We recommend that a determination of the number and kinds of personnel needed by the agencies be made on the basis of objective studies, and that those outside the government who have the special competence to make judgments about the resources needed for effective management, planning, and policy-making be commissioned to make the needed studies.

3. Capacity of the Congress to Review Policies. The examples we have cited in Section B of the Appendix strongly suggest the need for improvement in policy formulation. And

they suggest, too, that this improvement can come from a number of sources: the Departments of the Federal Government -- from program managers to Cabinet officers; the Office of Management and Budget; the committees of the Congress; officers in state and local government -- indeed all those who have some hand in shaping policy.

There is one unit of government, however, which probably more than any other can bring about advances in this regard. We speak of the appropriations committees, and particularly the several subcommittees, of the House and Senate. The members of these committees have the unenviable task of relating expenditures to projected revenues; of reconciling what often appear to be unreconcilable priorities; and of insuring that funds are spent both efficiently and effectively.

The range and complexity of the matters which they must pass upon is staggering. A reading of any several years of hearings of these committees would convince even the most skeptical that the members have an extraordinary grasp of these matters.

Probably the most difficult of their tasks is to insure that funds are spent effectively. This presents a

special problem in a field like education where effectiveness is so difficult to establish. Difficult or not, this is "at the jugular" when it comes to determining whether or not the spending of money makes any difference.

We note that there is one professional staff member assigned to the Senate Subcommittee on Appropriations concerned with the Labor Department, the Department of Health, Education, and Welfare, the Office of Economic Opportunity, and related agencies. The comparable committee in the House has three staff members.

We are not in a position to know whether sufficient staff for such committees is six or sixty. But it is difficult for us to comprehend how one person, however capable he may be, can do the staff work needed to enable a committee to determine whether the $27 billion -- we repeat, $27 billion -- being spent by these major departments of government is resulting in effective action.

We recommend that a study be made of the number and kind of staff needed to enable the Congress to give the closest scrutiny to policies developed by the agencies.

4. An Approach to Policy Development. It would appear that in too many instances the notion of policy

is confined to an abbreviated statement of objectives. If policy is intended to govern major actions that must be taken to achieve goals, then the full range of these actions must be considered in developing policies. In the Appendix we have identified a number of issues that should be dealt with in a policy statement related to training of educational personnel.

We urge that those units of government concerned with effective management and planning (especially the Office of Management and Budget) develop the capacity to assist operating agencies in working out more sophisticated approaches to policy formulation.

5. Policy Panels. We have noted above the need for providing agencies with sufficient staff to develop adequate policies. There is also a need for drawing on the talents of those outside government. Policy panels, set up for their purpose, could make two important contributions to this aspect of government operations.

First, they could provide a wider range of expertness, and bring more varying points of view, to the process of policy formulation in specific areas. Those engaged in the administration of a government program, however capable

they may be, cannot be expected to have a competence that spans all aspects of that program. A policy panel would be an economical means of complementing the talents of those in government who are engaged in the development of policies.

A second contribution relates to the fact that a government official responsible for the development of policies of effective means must start this task by taking into account the governing statutes, the realities of budget and the budgetary process, and the existing policies in the higher levels of the Executive Branch. Any conclusions he may reach that are at variance with these realities - however perceptive, however sound they may be - cannot be taken into account in formulating policy. This, after all, is a basic condition of orderly government.

But the processes of government must not only be lawful and orderly. They must also be effective. Legislation, however carefully drafted, cannot anticipate the requirements for effective implementation in specific areas. Those at the higher levels of the Executive Branch cannot be expected to have a sensitive grasp of all the needs at the level of effective action. Finally, any responsible official in government must start with a

judgment about how much funding is available or expected, and shape policy accordingly.

There is need, therefore, for the means to develop recommended policies arrived at without taking into account these constraints. As one observer has noted, with reference to the field of science, "The enunciation of a national science policy should not be equated with a commitment to fund it. The process of funding must be fought over and over with each budget cycle. What is important is to have a science policy which makes that struggle more rational."[2] (Emphasis added). This view is as applicable to education as it is to science.

Panels of the sort suggested here could be of substantial assistance by providing this perspective in policy formulation.

We recommend that policy panels be established for major programs concerned with the training of educational personnel.[3]

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2. Myron Tribus, former Assistant Secretary of Commerce for Science and Technology. Science, September 25, 1970, p. 1293.

3. Section C of the Appendix gives further information about policy panels.

6. Time Needed for Developing Policies. The question of whether sound policies of effective means are developed faces perhaps its most crucial test at the point when legislation is passed. Those in the Executive Branch responsible for the implementation of legislation quite understandably feel compelled to carry out this task with dispatch. Such a disposition is desirable, in fact laudable. But not if quick action comes at the expense of carefully developed policies. The consequences of implementing a statute without adequate thought are serious -- indeed may be fatal to the success of a new act. Unfortunately, the deficiencies which result from hasty action often do not become apparent until after projects are funded and operating. Then it may be impossible to alter a course of action that can extend over several years.

It should be clear from a review of Section A of the Appendix to this report that, in most areas of educational endeavor, the time it takes to devise effective policies must be reckoned in terms of months, not days or weeks. The Congress can be helpful here by giving recognition to the fact that the development of sensible policies does take considerable time. This it can do either by

appropriate language in statutes or by making it eminently clear - in that which constitutes legislative intent - that the Executive Branch should implement legislation only after ample time has been devoted to the development of policies of effective means.

7. Making Public Policy Public. Government action in education, whether Federal, state, or local, must not only be more effective. It must also be more responsive.

In a democratic society, one may either accept government policy or reject it. If he rejects it, he should have available to him the lawful means by which he can seek to have it changed.

Increasingly, policies related to the training of educational personnel will have the most profound effects on the society. It is imperative that the individuals and institutions affected have the means to shape, or at least to react to, these policies. If the democratic process is to work in this area of life, several conditions must be met:

First, if one is to make a judgment about policies, he must know what they are. This means that the issues involved must be treated with such clarity and comprehensiveness that he can make an intelligent judgment. The

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response of the public to Federal policies is often determined by the degree of ignorance that exists about these policies and, in particular, ignorance of the background of judgment in which the policy was formulated. With a more visible process of policy formulation, it will be much easier for those affected by the programs to interact and to convey their views to those responsible for administering the programs.

Second, since many important policies will, of necessity, be developed by agencies (without benefit of public debate), opportunities must be provided by which an interested party can express his views before a policy is put in force. This suggests a procedure by which policies are announced first as declarations of intent or proposed policies - and given wide distribution - before they are adopted as official. Obviously, sufficient time must be provided for study of these proposed policies and for careful appraisal of the reactions received.

Third, there should be developed vehicles (like the policy panels suggested above) through which one can offer a critique of existing policy and suggest alternatives.

Such provisions will, in effect, provide windows to the bureaucracy - new means of communication between the citizen and his government.

Providing these new means of communication is overdue, not only in those portions of the bureaucracy in most direct contact with the public, but also at the highest Departmental levels, in the Office of Management and Budget, and in the committees of the Congress. And they are overdue not only in connection with Federal actions in education, but also with reference to the policy-development process of state and local governments.

In short, the conditions we have outlined above should obtain wherever and whenever significant decisions are made concerning the training and development of educational personnel.

Disadvantages

No course of action is without its costs, its possible disadvantages, its possible adverse consequences. There is an obligation resting on those who advocate new or different approaches to significant problems to at least note disadvantages or limitations, and to suggest ways by which these may be forestalled or confined in their effect.

With reference to the ideas advanced in this report, we see these problems:

> . . . . there is a possibility that fully elaborated policies may have the effect of limiting flexibility; or may be employed to frustrate the introduction of new and valid approaches to problems
>
> . . . . while rational, sophisticated approaches to policy formulation are highly desirable, there should also be a place for spontaneous action
>
> . . . . it is possible that the time needed to develop policies we have outlined here would be excessive
>
> . . . . outside experts may not be able to give the time needed to make policy panels work.

These and other problems will have to be confronted.

We suggest that the recommendations outlined in this report be carried into action on a pilot basis in one program or one grouping of programs. Those aspects of this approach to policy formulation which prove to be effective could then be applied on a more widespread scale.

Complexity

Some might be tempted to conclude from the limitations in policy formulation cited in this report that (a) they give evidence of questionable competence on the part of those associated with these activities in the Executive

or Legislative Branch, or (b) they give evidence that government at the Federal level has limitations in dealing with these problems which one would not find at the state or local level.

We find no warrant for either of these conclusions.

What is at issue here is complexity: at the moment, our problems in education are bigger than our knowledge of how to deal with them.

We refer again to former Counselor Moynihan who has had wide experience at all levels of government and who has thought deeply about matters concerning the fashioning of public policy. When he returned to his post at Harvard in December of 1970, he bade farewell to the President and an assemblage of his colleagues in the Executive Office and in the Cabinet. In the course of his remarks he offered three exhortations. One concerned complexity:

> The second thing is to resist the temptation to respond in kind to the untruths and half truths that begin to fill the air. A century ago the Swiss historian, Jacob Burckhardt, foresaw that ours would be the age of "the great simplifiers," and that the essence of tyranny was the denial of complexity. He was right. This is the single great temptation of the time. It is the great corruptor, and must be resisted with purpose and with energy.

> What we need are great complexifiers, men who will not only seek to understand what it is they are about, but who will also dare to share that understanding with those for whom they act.[4]

We have stressed again and again in this report how important the training and development of educational personnel is to the realization of the nation's goals in education. We need to emphasize that if it is one of the most important, it is also one of the most complex problems those in and out of government must face.

No useful purpose is served by blame-giving. What we must do is see in what ways we can aid those who must carry these burdens. This Council has attempted, in this report, to offer some modest proposals. We hope others will advance alternative - and better - approaches. We harbor a faith that there is ample genius in this nation to deal effectively with any important social problem.

The Authority of Sound Policy

James Reston recently noted the disparity between accomplishments in the realm of science and those in the realm of politics.

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4. The Washington Post, December 28, 1970, p. A18.

While conceding the limits of applying science to the political process, he wrote:

> Yet there are some things in the space program and the scientific process which would obviously help the political process in Washington. Science does concentrate on the future. It does take a critical attitude toward its own assumptions and habits of thought. It does question abstractions and assume that wrong assumptions will produce wrong results. And it does insist that ignorant, incompetent or even half-trained men, no matter how amiable, are not good enough to go to the moon.

He continued by posing a question which is relevant here:

> The question is almost trite but cannot be evaded. Why, if Washington can organize all this intricate information, reduce all this mathematical diversity to identity in a single rocket -- big as a forty story building -- and send it on bullseye target to the moon, why then can we not apply some of the principles of the scientific process to the political process?

For our part, the answer is "We can, if --." The "if" relates to something said by Jacob Bronowski whom Reston quotes. "This is the message of science: our ideas must be realistic, flexible, unbigoted. <u>They must create their own authority</u>."

If policies developed to guide the efforts now being undertaken in education are the products of sensitive

insight, solid evidence, and rigorous analysis, they too will take on their own authority, an authority which will help to bridge the gap between the Executive and Legislative Branches of government; which will encourage appraisal of a man's ideas on their worth, rather than on his place in the bureaucratic hierarchy; which will make bend before it the petty politics which frustrates great accomplishment; which will force us to come to grips with the scale of effort required to make our actions meet our goals.

* * * * *

Recommendations

Over 52 million students are enrolled in institutions of higher education and in the public elementary and secondary schools of the nation. Operating costs to maintain these colleges and schools exceed $67 billion. Of this total, $29 billion is spent to employ three million educational personnel.

Research evidence -- and the common experience of anyone who ever sat in a classroom -- suggests that the effectiveness of schools and colleges turns largely on the effectiveness of the people who staff them.

The Congress is currently appropriating over $300 million annually to support Federal efforts designed to improve the effectiveness of educational personnel.

These efforts will, in turn, be effective only if there is a clear idea of what is intended, how it is to be achieved, and how these goals and strategies are determined.

This is the burden of "policies of the effective means."

It is these considerations which have led us to place such importance on the need for substantial improvements in the development of policies related to the training and development of educational personnel.

It is these considerations which prompt us to make the following recommendations:

> . . . that the President place special emphasis on the need for improvements in policy formulation by all units of the Executive Branch concerned with education professions development;
>
> . . . that the Congress --
>
> continue its support of legislation which provides the units of the Executive Branch with the flexibility needed to insure effective outcomes in education professions development;

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provide the funds and staff needed by agencies which administer education professions development programs to develop sound policies in this important field of endeavor;

require the kinds of reports - with particular emphasis on policy statements - which will enable it to make sound judgments about the effectiveness of Federal programs in education professions development;

provide the funds and staff to Congressional committees to enable them to give the most careful scrutiny to policy statements and other reports;

that all those concerned with educational policies, in or out of government, communicate to this Council alternatives to the recommendations outlined in this report or ideas which they feel will strengthen the process of policy-making in Federal education activities.

II. APPENDIX

In this Appendix the Council expands on several ideas advanced in the body of this report.

There are three sections:

A. Some Essential Elements of Policy

B. An Examination of Some Existing Policies

C. Establishing Policy Panels

SECTION A - SOME ESSENTIAL ELEMENTS OF POLICY

The word "policy" has been used a number of times in this report. It is important to specify what is meant by this term when applied to efforts related to the training and development of educational personnel.

Policy, in our view, means a declaration which will clearly communicate the ends and means intended in a given effort, and the rationale by which the ends and means were determined.

The outline below identifies four elements that should be considered in fashioning policies related to education professions development. This outline is designed to be a helpful guide to those responsible for the development of policy. It is not offered as a definitive statement. However, it is hoped that it will provoke discussion of ways in which improvements may be made in the formulation of policy. Obviously, in an area representing such great variety of activity, all elements will not necessarily be applicable to all situations.

With these caveats, we suggest the following be taken into account in the formulation of policy:

a. Formal written statements - identified as official policy and readily available to those who will be affected - should be prepared by each agency.

b. All significant policies of an agency which bear upon the training of educational personnel should be brought together in one statement. This would include both policies which deal with general issues and those which pertain to special issues related to the several programs of an agency.

c. The following matters, as a minimum, should be treated in a policy statement:

(1) Objectives. No obligation rests more heavily on those in the Federal agencies than that of developing objectives which will govern a given educational effort. Yet, all too often, objectives are stated with such brevity and in such general terms that they do not communicate what is intended. Equally limiting is the practice of identifying, as objectives, those goals stated in the authorizing legislation, without showing how they relate to the

particular set of circumstances being dealt with in a program.

In the development of a statement of objectives, it is essential that the character of the need, or problem, which brought a program into being be identified and fully described. Equally important, the nature and extent of the accomplishments that are being sought should be described in as concrete terms as possible.

(2) Strategies. Having established the objectives of the program, the agency has a task of working out the means by which the objectives are to be realized. A policy statement should reveal what these strategies are and provide the rationale which led to their adoption. Such a rationale should make it evident why the agency feels that the means employed to realize objectives are the most efficient and effective that can be devised.

(3) Priorities. Two types of priorities need treatment in a policy statement. First, where authorizing statutes give an agency latitude in the determination of how funds are to be allocated, decisions

must be made by the agency as to which broad problem areas are to be attacked. Second, having established programs to deal with these problem areas, an agency must communicate to school systems and colleges what kinds of proposals will be given priority consideration. In either case, a policy statement should spell out the range of options which were considered and reveal the criteria and rationale used in selecting those which have been accorded priority.

(4) Evaluation. Evaluation is a subject that should be given a prominent place in a policy statement. Included here should be the purposes evaluation is designed to serve; the criteria by which the program and the projects are to be judged; the types of evaluation to be employed; the time in the life of the program (or the projects) at which evaluation is to be undertaken; and like matters. Again, the policy statement should provide the rationale supporting these major decisions. Admittedly, establishing evaluation policies before a program is operational is extremely difficult. But confronting this question at the outset will introduce a useful discipline

into the development of objectives, strategies, and priorities.

(5) Diversity. Clearly, the manner in which educational personnel are trained will have a profound effect on the philosophy, the curriculum -- indeed, the whole nature of the education received by students whom these personnel serve. Thus, the Federal Government, in actions it takes to improve the qualifications of educational personnel, cannot be indifferent to the philosophical or ideological bases of the various approaches to personnel training it elects to support. It would be more than unfortunate if any Federal agency having responsibilities in this area became so preoccupied with efficiency or effectiveness that it supported only one approach - or only certain kinds of approaches - to the exclusion of others which represent varying philosophies or values.

In the administration of Federal programs, great care must be taken to insure that all reasonable ways of dealing with a given problem - as proposed by school systems, universities, or other responsible

bodies - are entertained and given support. A policy statement should include both a clear endorsement of this principle of diversity and provisions that will leave no doubt that the principle will be honored in practice.

d. The usefulness of a policy statement depends not only on what subjects are included, but also how these are defined, elaborated, and discussed. Outlined below are some of the more important attributes of such elaboration:

(1) Clear delineation of the problems to which a given effort is designed to respond. Programs of the Federal Government in the field of education often appear to be solutions devised before a problem is adequately defined. Problem definition and assessment of need are the fundamental building blocks of sound policy. It is particularly important that this analysis of problems reveal an understanding of the factors which brought the problems into being.

(2) A fully developed rationale. The credibility of the major positions set forth in a policy statement depends on the manner in which they are

justified. Assumptions, data, research evidence, logic, hypotheses, and, above all, "the best judgments of sensible men," should be clearly laid out to support the validity, the relevance, and the feasibility of what is being attempted.

It is imperative that this task be approached with complete candor. Those responsible for developing a rationale should indicate where areas of uncertainty lie and what degree of confidence can be placed in evidence that is invoked. Unwarranted certitude will lead only to expectations which cannot be realized. Those in the agencies who have the courage to deal frankly with these matters should receive every support from the Congress and the educational community.

Providing a rationale for each important component of a policy statement will also aid in the resolution of one of the thorniest problems facing an agency: in discretionary programs, how much flexibility or autonomy should be accorded those who direct Federally-funded projects in the states, in schools or colleges, and in other local settings?

The public interest is best served when an agency avoids the extremes of detailed and arbitrary prescriptions on the one hand; and, on the other, a stance which conveys the impression that any interpretation of a statute or program is permitted. In dealing with this problem, an agency has two obligations. First, to insure that its policies reflect the letter and intent of governing statutes, and where circumstances require interpretation, to make clear both the agency's interpretation of the statute and the reasoning behind its construal. Second, for matters not dealt with explicitly in the statutes, to take positions on those issues which it deems important, and to provide an adequately supported -- and publicly-stated -- rationale for these positions. All other actions can appropriately be left to the initiatives of those carrying out the projects.

(3) Evidence of system-thinking. Efforts to improve the training and development of educational personnel cannot be considered in isolation from curriculum, organizational arrangements, and the

other realities of the educational process. Hence, policies concerning personnel should demonstrate how these other factors have been taken into account and show how a given effort will relate to, and reinforce them.

This kind of comprehensive approach is applicable to the concept of personnel development itself. One of the main purposes of the Education Professions Development Act is "to improve the quality of teaching." This general purpose, conveyed in other statutes as well, requires that consideration be given to two kinds of action. First, attracting to the education professions those whose attitudes, intelligence, knowledge and skills offer the greatest potential for carrying out their tasks in an effective fashion. Second, taking whatever steps are necessary to insure that the potential of those individuals who are recruited to educational endeavors is brought to full realization.

It is generally recognized that training, both before the individual receives his first assignment and throughout his career, is essential in developing

his potential. However, attention to a host of other factors is also necessary if general improvement in the quality of teaching, counseling, and administration is to be achieved: more relevant criteria in licensing educational personnel; a reward system that motivates people to the highest achievement of which they are capable; arrangements for the most effective utilization of the various kinds of talent available in a faculty; an approach to tenure which safeguards the interests of both student and faculty member; special efforts to provide assistance and counsel to educational personnel in the critical first several years of their career; environmental conditions that will increase the prospect that the efforts of educational personnel will be met with success; and like matters. A policy statement should indicate how an agency plans to deal with these factors.

(4) Specification of categories of personnel to be affected. The specific categories of educational personnel, as well as the number of individuals who are to be affected by a program, should be clearly identified. Such a statement should be accompanied

by an indication of the manner in which the special needs of a particular category of personnel will be met by the proposed course of action.

(5) Clear statement of the nature, quality and quantity of the yield expected from the effort -- and over what time span. A very useful discipline for those engaged in policy development is to provide a "picture" of the accomplishments that may be expected at a particular point in time. These estimates of outcomes or results, made at the outset, are needed to guide those concerned with the implementation of policy and those concerned with the evaluation of policies, programs, and projects.

(6) Alternative courses of action considered and why rejected. It is not satisfactory for an agency to declare a given course of action as the most appropriate one unless alternatives which were considered, and the reasons for their rejection, are also revealed in a policy statement.

(7) Conditions for the success of an effort. Often a policy can be effective only if certain conditions -- some outside the purview of the

policy-maker -- are present. A policy statement which makes note of these conditions will increase the likelihood that they will be taken into account in the planning of specific local projects.

(8) Anticipating possible adverse consequences of a policy. Advocates typically see only the advantages of a course of action they are advancing. Unless the possibility of adverse consequences (or side effects) is also explored, and unless steps are taken to provide for their amelioration, costly mistakes may result.

(9) Other Federal, state or local policies and programs taken into account. A policy statement should review what related efforts are underway or contemplated, and indicate how the intended course of action will complement these activities and, at the same time, avoid duplication.

(10) Active efforts at coordination. An effective approach to the training of educational personnel requires bringing to bear a variety of resources, not all of which may be found in a single agency of government. Though a policy statement will, of

necessity, be concerned primarily with carrying out the specific mission assigned to a unit of government, it should also reflect an awareness of the larger context within which that mission is to be carried out. With that larger context defined, it is important that a policy statement indicate what steps will be taken to coordinate related government activities, and how this coordination will result in a more effective attack on the problems that have been identified.

(11) Planned variation. Knowledge concerning the training of educational personnel is not sufficiently advanced to predict with certainty which of any several ways to proceed on a problem will produce the most effective results. If policies of effective means make provision for supporting, concurrently, different approaches to a problem, it will be possible to examine the effects of these variations when the policies are carried into action. Thus, planned variations can provide information essential to future policy determinations.

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(12) Pilot efforts and policy. "Planned variation" is appropriate for insuring that alternative approaches are taken in dealing with specific problems of personnel training and development. Similar provisions need to be made in connection with the general policies of agencies engaged in these activities.

It is unrealistic to assume that these general policies - even if developed and executed under optimum conditions - will necessarily produce the results intended. An agency must be prepared with alternatives when it becomes evident that existing policies are not working.

The need for evidence to support these alternatives must be anticipated. This requires that, at the point when an initial set of policies is adopted, alternatives be identified, and resources be devoted to support pilot efforts designed to determine their advantages and limits.

(13) Exemplification. It is entirely appropriate that policies enunciating the broad goals in education be stated in the most general terms. However, policies concerned with effective implementation of these goals need considerably more specification.

The language employed to describe educational activity tends to be vague and ambiguous. In particular, educational innovations are often advanced in terms of slogans and catch phrases which obscure rather than clarify.

It is important that, in developing policies of effective means, terms be defined. Even more important, educational concepts employed in policy statements should - in every instance possible - be accompanied by citations of particular settings where the concepts have been applied in action and where the character and quality of this application most closely approximates what is being proposed on a national scale.

(14) Critical mass. There is one observation about Federal activities in education that can be made with considerable confidence: the resources needed to produce effective results in any given setting or project have, in general, been substantially underestimated. Specifically, (1) the amount of money allocated to a project often bears little relationship to the magnitude of a task being

attempted by the school system or college involved; (2) the time in which favorable results can be expected is typically estimated to be in the order of two or three years when it would be more realistic to think in terms of five to seven years, or more; (3) resources are devoted to only one aspect of a problem despite the fact that the impact sought after can be achieved only if improvements are brought about, concurrently, in several aspects of the educational process.

The development of realistic objectives and strategies requires that considerably more attention be given to (a) achieving a "critical mass" in local projects, and (b) establishing criteria which can be employed to estimate, in any given instance, what minimum resources will be needed to produce results.

* * * * *

It should be clear, from the foregoing, that policy statements --

(a) will be substantial documents, running to many pages;

(b) will require great skill and considerable time to develop, if they are to be done well;

(c) are not substitutes for Guidelines (prepared by agencies for those who wish to submit proposals) or for Regulations (which are designed primarily to serve legal purposes). Guidelines should be a summary of the major features of the policy statement. The policy statement would then serve as a context within which the Guidelines could be interpreted;

(d) are not substitutes for a planning process or a system of management control. The development of a policy statement should precede the adoption of an approach to these forms of administrative action.

To summarize: the essential attributes of a policy statement, as we have defined it, are --

(a) that a course of action be defined and justified to the point where what is intended is eminently clear to all who need to know;

(b) that the issues related to the course of action be examined with such thoroughness that an

intelligent judgment can be made about the soundness of policies that are being proposed, or policies that have been adopted.

SECTION B - AN EXAMINATION OF SOME EXISTING POLICIES

In this section the Council cites some examples which illustrate the need for improvement in the formulation of Federal policies related to the training and development of educational personnel.

In presenting these examples we have used as headings the names of agencies administering programs. However, it should be noted that, in certain instances, an example may demonstrate the need for improvement in policy-making on the part of units of the government other than the operating agency (for example, Congressional Committees, the Office of Management and Budget, etc.)

It should also be noted that, in offering this critique, the council's special concern is the process of policy-formulation and the format and informational content of a policy statement, not the nature of a policy itself.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Bureau of Educational Personnel Development

The Education Professions Development Act, passed in 1967, declares the following purposes:

> Sec. 501. The purpose of this title is to improve the quality of teaching and to help meet critical shortages of adequately trained educational personnel by (1) developing information on the actual needs for educational personnel, both present and long range, (2) providing a broad range of high quality training and retraining opportunities, responsive to changing manpower needs; (3) attracting a greater number of qualified persons into the teaching profession; (4) attracting persons who can stimulate creativity in the arts and other skills to undertake short-term or long-term assignments in education; and (5) helping to make educational personnel training programs more responsive to the needs of the schools and colleges.

With the exception of Part E (which is related to higher education), the provisions of this Act are administered by the Bureau of Educational Personnel Development, a major unit of the U.S. Office of Education.

The Bureau has created fourteen programs, as follows:

Career Opportunities Program
Teacher Corps
Urban/Rural School Development Program
Training of Teacher Trainers Program
Training Complexes Program
Bilingual Education Program
Educational Leadership Program
Early Childhood Program

Personnel Services Staff Program
Special Education Program
Vocational Education Personnel Program
State Grants Program
School Personnel Utilization Program
Teacher Development for Desegregating Schools Program

Materials describing the objectives and other operational details of each of these programs have been prepared by the Bureau.

In the case of three of these programs, the form they have taken is, in large measure, prescribed by the statute. In the remaining cases, the existence and nature of the programs, as well as the way funds have been allocated to them, are the result of decisions made primarily in the Bureau.

These fourteen programs are primarily directed at improving the qualifications of personnel who now serve, or who will serve, in schools with concentrations of children from low-income families.

In implementing the provisions of the governing statute, this Bureau has taken a number of important initiatives. The imagination shown here reflects credit on the leadership of this unit - at all levels.

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However, in one area there is need for substantial improvement. We refer to the formulation of policies needed to inform and guide this array of activities.

We have cited above the major purposes of the Education Professions Development Act. We have listed the programs established by the Bureau of Educational Personnel Development to implement this legislation. What is not available - because it has not been produced - is a policy statement which defines, and provides a supporting rationale for, the objectives, strategies and priorities which led to the establishment of these particular programs.

As a consequence, it is not possible to get a clear idea of what this agency's position is on the many issues which so crucially influence the direction and quality of its activities.

Several examples will illustrate this need:

a) Actions taken to improve the qualifications of educational personnel should be based on a systematic analysis of the problems which limit the effectiveness of personnel in the schools.

This Bureau's policy statement should identify these problems and demonstrate how the programs it establishes are designed to deal with them.

b) Historically, the training of educational personnel who staff elementary and secondary schools has been provided primarily by institutions of higher education. By and large the efforts of the Federal government to improve the qualifications of these personnel have been carried out under the auspices of these institutions. Over the last several years the Bureau of Educational Personnel Development has taken the position that the design and implementation of such training programs should be determined by the university, the school system, and the community, acting under an arrangement of parity.

Our concern in this report is not the merit of such positions. However, decisions of such importance need extensive treatment in a policy statement, one which deals with the limitations of traditional arrangements, the advantages of the new approach, implications of the change, etc.

c) Materials prepared by this Bureau are replete with reference to change. However, it is not clear whether the intent here is to develop a climate in which the educational community will be caused to examine its present practices and propose improvements; or whether the Bureau is advocating certain substantive changes. The Bureau should make clear its position on substantive matters and provide a rationale which supports this position.

d) "Innovation" is another term which needs definition and discussion. It would appear that only entirely new approaches to problems are considered for support. If so, this would exclude present approaches to training which are based on sound premises but which need additional resources to demonstrate their full effectiveness.

The Bureau of Educational Personnel Development has one of the most crucial roles in the Federal effort to improve education. It may take some time to evaluate the effectiveness of the manner in which it carries out its

charge. For these reasons, policy statements, reflecting a careful working through of issues, take on a special importance.

Task Force Subcommittee on Training

In the spring of 1969, the Department of Health, Education, and Welfare established several task forces to formulate program directions for 1971-1975. These task forces were directed to reassess national needs, the Federal role in meeting them, and the proper strategies for carrying out the Federal role. Under the Education Task Force there were fifteen subcommittees, ranging from Urban Education to Technology and Libraries. The Training Subcommittee was responsible for planning the major programs which support training for elementary and secondary and higher education personnel, for teachers of the handicapped, and for librarians.

The Training Subcommittee was composed of thirteen persons, including officials of the Department and other government agencies, representatives of schools and universities, and persons outside the "education professions" with a special interest in the field of education manpower needs or training.

Those serving on this Subcommittee (under the leadership of Don Davies, then Associate Commissioner of the Bureau of Educational Personnel Development) were very able people. The Subcommittee was extremely well organized. Each manager of an existing Federal training program presented a description and justification of the activity for which he was responsible, and recommended changes which he thought would improve his program.

Despite the importance of this endeavor, and the assets of the Subcommittee noted above, this effort to develop recommended policies represents some serious limitations:

a) the subcommittee had but ten working days to review the operation of a score of programs, involving an expenditure of over a billion dollars; to assess needs in areas of training as disparate as early childhood teachers, graduate school professors, Teacher Corps, paraprofessionals, library work, teachers of the handicapped, etc.; to deal with a number of complex and far-reaching issues posed by these reviews and assessments; and to formulate a set of recommended policies which,

if adopted, would have a substantial influence on the way school systems and universities trained education personnel.

b) in large part as a consequence of the limited time available, the Subcommittee had little opportunity to provide an adequate rationale for the major components of its policy recommendations.

c) a six-page abstract of the Subcommittee's report was the only document given public distribution.

d) the recommendations of this Subcommittee may have had the effect of influencing particular budget or program decisions in the intervening period. However, the Department has not acted on the report in a manner which would establish what its official policies are on the major questions dealt with by the Subcommittee.

The Basic Studies Program

The Basic Studies Program was established in 1968 by the Office of Education's Bureau of Educational Personnel Development. It was designed to provide both pre-service and in-service training for teachers in the

elementary and secondary schools. The primary concern of the program was to increase the subject matter competence of those teaching in approximately eleven fields (for example, reading, English, foreign languages, history, mathematics and the sciences).

This program was a continuation of an effort that began in 1958 with the passage of the National Defense Education Act. This statute (enacted with the strong support of President Eisenhower) authorized, among other things, institutes in the foreign languages for secondary school teachers. Subsequent Congressional and Executive Branch decisions provided further support for this kind of endeavor. The NDEA was amended to make possible teacher institutes for a broad range of basic subjects. The original Title V of the Higher Education Act authorized the Prospective and Experienced Teacher Fellowship Programs. As a result, over the ten year period ending in Fiscal Year 1969, more than $260 million had been appropriated for the general purpose of improving the subject matter competence of teachers in the elementary and secondary schools.

For Fiscal Year 1970, $80 million was appropriated to support the ten programs administered by the Bureau of

Educational Personnel Development. Of this amount, $13 million was allocated to the Basic Studies Program.

In July of 1969 the Office of the Secretary of Health, Education, and Welfare ordered that this $13 million allocation be reduced by $8 million.

In response to a letter from this Council urging reconsideration of this decision, the Secretary of Health, Education, and Welfare wrote on December 10, 1969:

> The proposed cutback is part of Government-wide efforts in which HEW is participating to make further expenditure reductions in 1970. Since the 1970 budget was submitted to the Congress, the estimate of outlays for the total Federal budget has risen $3.5 billion. In order to combat inflation and comply with the Congressional ceiling on total Federal outlays, the President has required that actions be taken to hold 1970 Federal outlays to the budget estimate of $192.9 billion. All Federal agencies are being required to limit outlays in 1970-- under a fixed ceiling established by the Bureau of the Budget.
>
> Pursuant to these limitations on total expenditures in fiscal year 1970, the Department of Health, Education, and Welfare found it necessary to propose some reductions in budgeted funds for a number of its programs. It decided to do this, to the extent possible, on an across-the-board basis in order to minimize the adverse impact on any one program. Under this policy, cuts were made in all project grant and contract programs of the Department and in funds for all of the Department's direct operations.

> The reduction of $8 million in education professions development programs was part of this overall cutback program. We believe this approach is the most reasonable one that can be taken in the light of current fiscal restraints.

This letter makes clear the circumstances that led to budget reductions at that time. But the decision to direct a substantial cut in the Basic Studies Program was not only a response to fiscal reality. It also represented a major shift in policy related to the training of educational personnel in the elementary and secondary schools. As such, it raises a number of important questions concerning policies of effective means:

> Given the fact that there were ten programs administered by the Bureau of Educational Personnel Development, why was this particular program singled out to absorb all the cut?
>
> Did this action mean that the quarter billion dollars spent on this type of activity over the past decade was a mistake? If it was a mistake, was it a question of the wrong objectives or the wrong strategies or means?
>
> What evidence was assembled to support this decision?
>
> Was there no longer an urgent need for improving the subject matter competence of teachers?
>
> Had those who made this decision developed an alternative strategy which was considered to be more effective?

The answers to these questions are not available from any documents in the Department. There was no policy statement prepared in taking this action. Nor, apparently, was any written explanation given the Commissioner of Education or the Bureau Chief directly concerned.

In a letter dated October 1, 1969, the Associate Commissioner for the Bureau of Educational Personnel Development advised all "Institutions, Agencies and individuals preparing to submit proposals requesting Federal support under the Basic Studies Program," as follows:

> I should like to inform you of an important change in the status of the Basic Studies Program in the Bureau of Educational Personnel Development. Proposals for that program cannot be accepted this year. Previous announcement made in the Bureau Fact Book for this program is hereby cancelled.
>
> In line with the necessity for reducing Federal expenditures for fiscal year 1970 by three and a half billion dollars, the Department of Health, Education, and Welfare has designated a series of specific reductions in planned programs. The Basic Studies Program has been directed to absorb eight million of that amount. This action, coupled with obligations to make a special effort to retrain teachers of the disadvantaged in the South, and the necessity to continue some projects funded last year on a multi-year basis, prevents any consideration of new proposals this year.

No explanation was given as to why the Basic Studies Program was chosen for the cut.

Five months later the funds were restored. If those outside the government were ignorant of the reasons for excising these funds, they were no more informed when the funds were restored. The announcement of this new action reads, in part, as follows:

> By letter of October 1, 1969, we informed you of an $8 million reduction in funds for the Basic Studies Program as a part of government-wide expenditure reductions. We are pleased to announce that arrangements have been made by the Department of Health, Education, and Welfare for restoration of those funds.
>
> In part these funds will be used in the following academic fields: reading; bilingual education; civics; and arts.

By the time the funds were restored it was not possible to assign them to projects of the character previously supported in this program.

Later that Spring the Bureau announced the list of programs to be supported in Fiscal Year 1971. The Basic Studies Program had been dropped from the list.

The issue here is not that funds for the training of educational personnel were cut; the Department had no alternative but to make budget cuts somewhere. Nor is the issue

the decision to make an entire cut in one program; if there was compelling evidence that one of the programs was significantly less effective than the others administered by this Bureau, then there was an obligation to take the action that was announced.

The questions that are at issue are three:

> Was a careful analysis made, by the Department of Health, Education, and Welfare, of the relative merits of the several programs in this Bureau before the decision was made to place all the reduction in one program?
>
> Did this action represent, in fact, a major policy shift in the Department?
>
> If such an analysis was made and such a policy change was intended, why was this information not made public in a fully-developed policy statement?

This decision was made at the Department level. Only officials at that level could have provided this information.

Title I, Elementary and Secondary Education Act

Under Title I, Elementary and Secondary Education Act, a little over a billion dollars is appropriated annually to provide additional educational opportunities for children of low-income families.

According to the Fiscal Year 1968 statistical report on this program, approximately $600 million of this billion

dollar appropriation was used - by the 20,000 local school districts which administer this program - to employ 200,000 additional educational personnel. However, only 77,000 of these 200,000 persons received any sort of in-service training, for an average of only 33 clock hours per person, during the year covered by the report. Nine million dollars was spent for this purpose.

Title I is the largest single effort of the Federal Government to improve education. To a large degree, the effectiveness of such a program turns on the effectiveness of the educational personnel involved. First, three fifths of the resources of this program have been invested in people. In addition, research evidence is increasingly recognizing the importance of personnel in the educational process. The Commissioner's Annual Report, "The Education Professions, 1969 - 70," states:

> and recently, Dr. James Coleman said that new studies have led him to conclude that "variations in teachers" characteristics account for more variation in children's standardized performance in cognitive skills than do variations in any other characteristics of the school. Dr. Coleman was chief author of the 1966 study Equality of Educational Opportunity, which claimed that social environment was the most significant factor affecting student achievement.

Yet there are no policies (of the sort outlined in Section A) developed by the Office of Education, the states or the local school district governing activities related to the training and development of the personnel engaged in this important program.

The Educational Research Training Program

The Educational Research Training Program, authorized under Title IV of the Elementary and Secondary School Act of 1965 is designed to meet the need for new personnel engaged in research, development, dissemination and evaluation.

In Fiscal Year 1969, this program supported five types of activities for a total of $6.7 million. Of this amount $4.9 million was spent for eighty graduate programs in 56 institutions. Over 800 students were enrolled.

For Fiscal Year 1971, the Administration requested $6.2 million for these activities. The House of Representatives approved an appropriation in this amount. However, the Senate Committee on Appropriations, with the Senate later concurring, recommended a $4.25 million reduction in this amount. The Committee report stated:

> For research training the committee is recommending $2,000,000, a reduction of $4,250,000 from both the House allowance and the budget estimate.

> The committee notes the new efforts being undertaken in this area and would encourage them. The present program, however, is unimpressive. (Emphasis added)

Apart from the underscored comment above, no additional information was provided with reference to this decision.

When an appropriations action also constitutes a policy decision based on an assessment of the effectiveness with which a program is being carried out, it is imperative that the position of the Congress be clear with respect to the reasons for such an action.

THE NATIONAL SCIENCE FOUNDATION

The National Science Foundation was created in 1950. Its policies are established by the National Science Board, a body consisting of the Director and twenty-four members appointed by the President.

For Fiscal [illegible] 1971, the Congress appropriated $513 million to the Foundation. Of this total, $100 million was devoted to activities under the heading of "education and training." The balance was assigned to basic and applied research and other activities. Programs related to education and training are administered by one of the major divisions of the Foundation. The bulk of the funds in this division are devoted to improving the qualifications of personnel engaged in teaching and research in the sciences.

Several examples will illustrate the need for improvements in the formulation of policies related to the training and development of educational personnel. (It will be apparent that improvements are in order not only on the part of the Foundation, but also on the part of those other units of government whose actions affect the operations of the Foundation.)

1. Institute Programs. One of the important efforts of the Foundation over the years has been directed at improving the qualifications of those now teaching mathematics and science in the secondary schools of the nation. The Foundation has provided support to colleges and universities offering NSF-sponsored academic year and summer institutes, and stipends to teachers-in-service who attend these institutes. Almost half a billion dollars has been spent on these two programs since they were inaugurated seventeen years ago.

The effectiveness of the institute programs was discussed at some length in the 1970 hearings of the House Subcommittee on Science, Research, and Development. Foundation officials were asked about the importance of these programs in the total training effort of this agency. Responding to this question, the Associate Director of Education said:

> I think that the institute programs per se did not accomplish all that we had expected they would, although a study made by an outside group pointed out that the institutes have been one of the more innovative educational mechanisms that we have introduced. As a matter of fact, I think it can be said that the Office of Education has seen fit to utilize this mechanism in other than the science areas. One of

> the things that institutes did not accomplish, according to this report -- and we see evidence of this -- is that the results of summer and academic year activities supported at colleges somehow were not translated into curriculum changes at the colleges and universities. Institutes did not have the desired effect upon pre-service teacher training that we had originally set as one of the objectives.[1] (Emphasis added)

It is clear from this statement that the translation of results of these institutes into curriculum changes in colleges and universities has been considered an important objective by the Foundation.

One would expect, therefore, to find such an objective featured prominently in the Foundation's official documents. It is not. Indeed, the whole subject of objectives is given very limited treatment. In the general statement of the 1968 Guide (prepared for universities planning to submit proposals under the Academic Year Institute Program), the only reference to objectives is as follows: "The institutes are directed toward broadening the teachers' scientific knowledge and increasing

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1. 1970 National Science Foundation Authorization Hearings before the Subcommittee on Science, Research, and Development, of the Committee on Science and Astronautics, U. S. House of Representatives, Volume I, p. 191.

their capacity to motivate students to consider careers in science, mathematics, or engineering."[2]

Reference is made in the Guide to effecting changes in the curriculum of colleges and universities, but this is found in the more detailed instructions for drawing up proposals:

> 1. Institute Objectives --- The major goals of the proposed institute should be carefully stated and justified. Explanation should not be merely general statements of broad need or statistical surveys. Rather, the rationale should be precise and should specify the particular type or level of teachers or supervisors for whom the institute is planned. There should be an indication of how the proposed institute relates to, and what implications it might have for, the institution's teacher-training program.[3] (Emphasis added)

Very explicit reference to this objective is found in another Foundation document:

> 1. Institute Objectives
>
> The stated goals should be consistent with the Foundation's objectives, and should be realizable in the framework of the institution's

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2. "Academic Year Institutes for Secondary School Teachers and Supervisors of Science and Mathematics: 1968 Guide for Preparation of Proposals and Operation of Institutes," p. 1.

3. Ibid., p. 6

> experience, educational climate, and general interests.
>
> One purpose of the institutes is to encourage colleges and universities to develop further their interest in the subject-matter education of teachers. Another purpose is to encourage mutual cooperation between departments of education and departments of science and mathematics within the colleges and universities. It is hoped that, after subject-matter-oriented science and mathematics programs for teachers are established as a result of such cooperation, these programs will become a part of the regular offerings of the institution in its teacher-training activities.[4] (Emphasis added)

But this document is one prepared for those several persons who review (and select for funding) proposals submitted by universities. It is not normally made available to the university officials who organize the institutes.

This illustrates an elementary point: there is little hope that objectives of a program will be achieved unless they are clearly stated and supported by a rationale which indicates the importance attached to them.

Part of the problem here is that over the years the House Subcommittee which appropriates the funds for the

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4. Memorandum of July 8, 1968 from the Program Director, Research Training and Academic Year Study, to members of panels evaluating proposals for 1969-70 Academic Year Institutes, p. 3.

Foundation has mandated that it spend "not less than" specified amounts for the in-service training of secondary school mathematics and science teachers. In addition, it has specified the form in which this training shall be offered. However, no rationale - of the nature suggested in Section A - has been offered by this Subcommittee to support the belief that the institute form is the most effective means to meet the general objective of improving the competence of secondary school teachers in these fields. If the Congress elects to single out particular categories of personnel for training, and to prescribe the specific nature of the training, it is confronted with the same task which faces the Executive Branch: dealing in a systematic manner with the full range of policy questions involved.

The House Subcommittee on Science, Research, and Development, which holds the authorization hearings on the Foundation, has resisted these annual limitation clause actions.

So has the Foundation.

But neither has offered comprehensive, adequately-supported policy alternatives. The Foundation sponsors

two other programs (the cooperative college-school science program and the pre-service teacher-training programs) designed to improve secondary school teaching in mathematics and science. In neither case, however, have the policies governing these programs been rationalized in the fashion outlined in Section A.

2. Graduate Traineeship Program. For the last few years the Foundation has sponsored two programs aimed at providing support for doctoral students in science and allied fields, and for the institutions of higher education in which they are enrolled. One of these is the Graduate Fellowship Program, funded in Fiscal Year 1969 at $9 million; the other is the Graduate Traineeship Program funded in Fiscal Year 1969 at $25 million. While some of those who received stipends under these programs entered industry or government, the goal of most was a career in teaching and research.

In the spring of 1970, it was announced that the Foundation's budget for Fiscal Year 1971 would contain no provision for first-year enrollees in the Graduate Traineeship Program. The decision had been made to eliminate this program.

One will not find in the official publications of the Foundation an explanation of this action. The reason for this is that the decision to eliminate support for the training of higher education science teachers and other scientific personnel was made not by the Foundation, but by the Office of Management and Budget. In view of this, it is disturbing to find that none of the public documents of the Office of Management and Budget provides background of the sort that would enable one to determine the rationale for this action; what alternatives had been considered; whether the full range of consequences had been explored; and the many other questions that need consideration in arriving at a policy.

The Office of Management and Budget is one of the chief means through which the President exercises his power to set the goals and establish the priorities of his administration; to control the budget in a way which will insure that actions taken at all levels of the Executive Branch are consistent with these goals and priorities; and to coordinate the efforts of the several Departments.

Not infrequently, in the exercise of their responsibilities, officials of the Office of Management and Budget and officials of the operating agencies will take different positions on one or more items of a Department-recommended budget. These differences are typically discussed in terms of levels of funding. But they also involve matters of policy; in many instances, very important matters of policy. When the Office of Management and Budget prevails in these negotiations, it is incumbent on this unit of government, no less than on an operating agency, to prepare a policy statement as complete as one expected from any officer of government responsible for policy formulation.

Such a statement should, of course, be a public document. It is hard to imagine a situation in the field of education when it would not be in the public interest to make this information generally available.

3. Students From Low-Income Families. One of the most significant developments in the past decade has been the effort - at all levels of government, and in both the public and private sectors - to provide new

opportunities for students from low-income families and from minority groups.

The National Science Foundation has no legislative authorization to engage in activities related to broad social purposes of this character. However, the scientific potential of these groups - largely unrealized, for a variety of historical reasons - presents both opportunities and responsibilities directly germane to the Foundation's charter.

The Foundation is authorized - indeed, directed - by the National Science Foundation Act "to initiate and support basic scientific research and programs to strengthen scientific research potential . . . ."[5] That the Congress intended to include the development of human resources as a part of strengthening "scientific research potential" is indicated by the fact that the Foundation is also authorized - and directed - to award "scholarships and graduate fellowships in the mathematical, physical, medical, biological, engineering, social, and other sciences."[6]

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5. National Science Foundation Act of 1950, as amended, Section 3(a)(1).

6. Ibid., Section 3(a)(2).

The Act further states that "The Board and the Director shall recommend and encourage the pursuit of national policies for the promotion of basic research and education in the sciences."[7]

Finally, the statute speaks to the general strengthening of education in the sciences, as follows:

> In exercising the authority and discharging the functions referred to in the foregoing subsections, it shall be one of the objectives of the Foundation to strengthen research and education in the sciences, including independent research by individuals, throughout the United States, and to avoid undue concentration of such research and education.[8]

Despite these provisions in the statute, the Foundation has not formulated policies - of the sort outlined in Section A - under which the scientific community could assist in bringing to full realization the scientific potential of students from low-income families and minority groups. Nor has the Foundation developed any comprehensive, fully documented policies relating to the manner

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7. Ibid., Section 3(d).

8. Ibid., Section 3(e).

in which the training and development of educational personnel might more fully contribute to the strengthening of the scientific research potential of the Nation - either generally, or with respect to those populations of students who have not had the benefit of resources to develop their scientific talent.

With the exception of specific reference to the form of student support, i.e., scholarships and graduate fellowships, there are no prescriptions in the statute governing the Foundation with reference to what must be done in the development of human resources or in education. At the same time, there are no proscriptions.

Indeed, the powers of the Foundation are very broad in these regards.

First, the Foundation enjoys an independent status:

> There is hereby established in the executive branch of the Government an independent agency to be known as the National Science Foundation (hereinafter referred to as the "Foundation"). The Foundation shall consist of a National Science Board (hereinafter referred to as the "Board") and a Director.[9]

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9. Ibid., Section 2.

Second, the policy-making authority of the Board is made eminently clear:

> . . . In addition to any powers and functions otherwise granted to it by this Act, the Board shall establish the policies of the Foundation.[10]

Third, the powers of the Director are very broad:

> Except as otherwise specifically provided in this Act (1) the Director shall exercise all of the authority granted to the Foundation by this Act (including any powers and functions which may be delegated to him by the Board), and (2) all actions taken by the Director pursuant to the provisions of this Act (or pursuant to the terms of a delegation from the Board) shall be final and binding upon the Foundation.
>
> The Director may from time to time make such provisions as he deems appropriate authorizing the performance by any other officer, agency, or employee of the Foundation of any of his functions under this Act, including functions delegated to him by the Board; except that the Director may not redelegate policy-making functions delegated to him by the Board.
>
> The formulation of programs in conformance with the policies of the Foundation shall be carried out by the Director in consultation with the Board.[11]

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10. Ibid., Section 4(a).

11. Ibid., Sections 5(b), (c), and (d).

It is difficult to conclude from this evidence other than that the Congress, having stated the broad goals, intended the Foundation to develop policies appropriate to the achievement of these goals.

Despite the numerous references in the statute to establishing policies and to engagement in educational matters, there seems to be an uncertainty among the National Science Foundation officials about the nature and scope of the Foundation's authority to support various kinds of educational activities. Of course, the concern that there are certain strictures on the Foundation in this regard may be rooted in the Foundation's interpretation of legislative intent. However, there is no record, in the office of the Foundation's General Counsel, showing that the Board has at any time sought a formal ruling on this question.

4. Junior and Community Colleges. The increasing importance of the junior and community college in American life is well known. What may not be so well known is that these colleges are now enrolling over fifty per cent of all the freshmen entering institutions of higher education.

Despite the obvious importance of this segment of higher education, the National Science Foundation has not developed policies delineating the nature or extent of its concern for the training of faculties engaged in developing the scientific talents of the students enrolled in these colleges.

The Foundation has no authority to provide general support to the scientific activities of the junior and community colleges. However, as noted above, the Foundation is authorized "to initiate and support . . . programs to strengthen scientific research potential," and "to strengthen research and education in the sciences."

The contribution of the two-year colleges to the scientific research potential of the nation is significant. It will become more significant over time. There is every indication that these institutions will become an increasingly important source of technicians needed in scientific endeavors. Further, the number of students who undertake graduate work in the sciences, and who begin their studies in two-year colleges, will increase.

It should be noted that the Foundation has sponsored programs for the training of instructional personnel in

the sciences, programs for which community and junior college faculty members are eligible. Further, the Foundation has recently inaugurated a program (the Technician Education Development Program) primarily aimed at assisting this class of institution to prepare technical back-up personnel for physical scientists and engineers. A portion of this program is concerned with improving the proficiency of the technical school faculty.

However, while there are programs, there are no policy statements which place these programs in a larger context; which delineate the nature and extent of the Foundation's intended support of scientific activity in the community and junior colleges; or which interpret the language of the statute governing the National Science Foundation as it may be applicable to the two-year institution of higher education. Such a policy statement is needed to guide the initiatives of the several echelons which administer activities in the Education Directorate of the Foundation itself. It is also needed by other Federal agencies, and by the states, to guide their decisions with reference to this important sector of education.

* * * * *

Some years ago the Foundation established an Advisory Committee on Science Education. For the last five years, this group has made written annual reports to the Director. The 1970 report, "Science Education - The Task Ahead for the National Science Foundation," was the first to be given public distribution. This report covers the full range of concerns in science education. Hence, issues concerning the training and development of educational personnel in science are not given the intensive treatment such a topic requires. However, this report will give some idea of the kind of assistance those outside of government can render to an agency concerned with strengthening the policy-making process.

We commend this initiative to the consideration of other agencies. At the same time, we invite the Foundation to explore the further possibilities inherent in the advisory committee or panel idea. These are outlined in Section C of this Appendix.

THE DEPARTMENT OF LABOR

For Fiscal Year 1969, Congress appropriated over a billion dollars for a variety of kinds of manpower training programs. Over a million persons who were unemployed or underemployed received some type of training in that year.

The Department of Labor has been given primary responsibility for the administration of these programs.

The institutional phase of the Manpower Development and Training Act of 1962, as amended, is the direct responsibility of the Department of Health, Education and Welfare. The Federal obligation for these HEW activities in Fiscal Year 1969 was over $196 million. This covered the costs of providing approximately 98,000 training opportunities.

Appropriations for the Training of Educational Personnel

Training for the educational personnel who serve those enrolled in the manpower training programs is provided for primarily by Section 309 of the Manpower Development and Training Act. Two per cent of the sums appropriated to carry out Titles I, II, and III of the Act are made

available for the training of personnel, and for technical assistance needed to strengthen the administration of local projects.

In Fiscal Year 1971, the two per cent "set-aside" under Section 309 amounted to $13 million. Of this amount, $2.78 million was assigned to the Department of Health, Education, and Welfare for technical assistance and the training of personnel employed in the institutional phase of the manpower training and development effort. The balance was expended by the Department of Labor.

Provisions for the Training of Educational Personnel

Training of staff personnel employed in the institutional phase of manpower training (administered by the Department of Health, Education, and Welfare) is provided under a program called the Area Manpower Institutes for the Development of Staff (AMIDS). (In 1970* an estimated 27,000 persons received training at the five AMIDS centers which had been established. These centers serve not only MDTA instructors, counselors, administrators, and supervisors [for whom the institutes were originally designed], but also staff from forty-three other agencies which

*See NOTE, page B-42

provide services for the disadvantaged. The typical mode of training was a one- to two-week workshop.)

In FY 1971 the $10.2 million available to the Department of Labor under Section 309 was used both to render technical assistance and to train various categories of staff personnel, including those concerned with instruction, counseling, and administration in local projects.

The major portion of these funds was devoted to technical assistance for contractors (there are over ten thousand such contracts) who provide the training for the underemployed and the unemployed. This help is made available to insure that contractors furnish their services in a way that is consistent with Department of Labor regulations.

Only a very small portion of this $10.2 million allocation was devoted to the actual training of personnel who staff the local manpower training projects.

Policy and Manpower Training Personnel

The Department of Health, Education, and Welfare has established a modest program for the training of instructional personnel engaged in the institutional phase of the manpower development and training program and in

other related programs. However, the Department has not formulated policies which indicate the nature and extent of the need for the training of personnel and which delineate objectives, strategies, and priorities appropriate to meeting these needs.

The Department of Labor has developed no policies of the sort outlined in Section A of this Appendix. In fact, there are not even any firm data on the number of people who staff the training projects (though it is estimated to be in the tens of thousands); on the categories of personnel employed; or on the quality of the background and prior training of these staff members. The Department is now collecting this information. These data are essential in taking the first step in policy formulation: defining the problem and assessing the nature and extent of personnel training needed.

* * * * *

The Federal Government is presently spending over a billion dollars a year to provide education and training for hundreds of thousands of people under manpower development and training programs. These programs are

designed to deal with one of society's most serious and pervasive problems.

As in the case of any education and training effort, effectiveness depends to a large extent on the skills, knowledge, and attitudes of those who do the instructing, provide the counseling, and give the leadership.

In the portions of this section devoted to the Department of Health, Education and Welfare and the National Science Foundation, we cited examples of what were characterized as limitations in the development of policies needed to insure the effectiveness of educational personnel. In the case of the Labor Department, it would not be inaccurate to say there is an absence of such policies.

THE NEED FOR REFORM

A former Assistant Director of the Bureau of the Budget, with over twenty-five years of experience in this activity, has made this observation about the role of the scientific community in formulating policy: "And it's turned, until recently at least, a deaf ear to all pleas from its friends in court -- and I was one -- to come up with science policies or science priorities and facts and justifications to strengthen an otherwise very shaky case against tough competition for dollars."[12]

The examples cited in this section suggest that the need for reform in the processes of developing policies of effective means is not confined to any single community or to any single unit of government.

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12. William D. Carey, as quoted in "Science Policy: An Insider's View of LBJ, Dubridge, and the Budget," Science, 5 March 1971, p. 875.

NOTE: Data concerning the AMIDS program, cited on pages B-37 and B-38, are for Calendar Year 1970.

In the first printing of this report Calendar Year 1969 figures were cited.

SECTION C - ESTABLISHING POLICY PANELS

The Council has placed considerable emphasis on policy panels as an important means of bringing about improvements in policy formulation. More detailed information on this idea is provided here.

Functions. A policy panel would have these functions:

a) To develop a statement, in the manner outlined in Section A, which would be recommended to an agency for adoption as official policy. In preparing these recommended policies, a panel would involve agency personnel in their deliberations and draw heavily on their knowledge and recommendations. However, the final product would represent the independent views of the panel. At the same time the agency would, of course, be free to adopt, adapt or otherwise respond to a policy statement prepared by the panel.

b) To recommend policies governing courses of action which were revealed to be necessary on the basis of an examination of needs, but which were not authorized by existing legislation, or not dealt with because limited funding or the existing mission of

the agency precluded their consideration. Such policy recommendations would be prepared for consideration by the higher levels of the Executive Branch or by the Congress, as appropriate.

c) To establish the means by which those who wished to do so could present to the panel critiques of existing or recommended policies, or could offer new ideas for strengthening policies.

d) To review annually the adequacy of policies in force. This review would take into account new needs, new knowledge, and the degree to which existing policies were producing the results intended.

e) To identify, on the basis of its initial experience in developing policies, and on the basis of its subsequent reviews, the kind of information (for example, specific kinds of manpower data) needed to improve policies. Few appreciate how limited are the data needed in educational policy-making.

Composition. Panels would be composed of five to seven members, appointed by that person in an agency

having the broadest responsibility for the training and development of educational personnel.

Those selected for the panel would be persons outside the Federal Government who could offer special expertness in the development of policy related to a particular problem or category of educational personnel. A most important consideration would be that the group selected represent various kinds of expertness and the widest diversity in philosophy and approach to problems. (Such a mix would include those concerned with theoretical matters and those with experience in operational realities; scholars in the academic disciplines and scholars concerned with the educational process; high-level decision makers and outstanding practitioners; those engaged in training educational personnel and those involved in employing the personnel who have been trained; persons who advocate varied approaches to the same set of problems; persons who are especially knowledgeable about quantitative and qualitative manpower needs; those with experience in the proposal-review process; and individuals representing fundamentally different philosophical positions.)

Assignment. Panels would be established at each of several administrative levels: (1) for each significant program of an agency; (2) for each unit administering a group of related programs; and (3) for each unit of government responsible for the overall administration of educational personnel training activities. (Employing the terms commonly used in the Executive Branch, these panels would be assigned at the branch, division, bureau, and Department levels.) Certain problem areas (for example, improving the qualifications of educational personnel engaged in vocational education, career education, and manpower training) are dealt with by several Federal agencies. In such cases, it would be advantageous to establish a panel whose concerns were not confined to a single Department.

Operation. Panels would be established whenever new legislation, or significant amendments to existing statutes, were passed; whenever major changes in policy under existing legislation were contemplated in the Executive Branch; and for programs which are now in existence, but for which no panels were established when the programs were inaugurated.

The complexity of policy development requires that members be in a position to work full time on this task over at least an eight to ten-week period. Panels assigned to undertake annual reviews of policy could be appointed for a somewhat shorter period of time.

Draft statements developed by these panels, together with comments by the agency, would become public documents. Expression of minority views of panel members would be encouraged and cited.

It should be evident from the details set forth in this section that panels would differ -- in intention and in operation -- from the practice of some agencies which invite individual consultants or advisory groups to provide oral reactions to program ideas currently under consideration.

Advantages. The statements prepared by policy panels would be employed in three ways:

a) they would provide the agencies with a set of recommended policies which would be of substantial assistance in the development of official policies;

b) they would enable the National Advisory Council on Education Professions Development to provide a more systematic and comprehensive review of the operations of the several Federal agencies responsible for the training and development of educational personnel. With this information the Council would submit to the President and Congress periodic reports appraising the adequacy of policies; indicating where more coordination among the agencies was required; comparing official policies with those recommended by the panels; determining what overarching policies were required with reference to the training of educational personnel; recommending whatever changes in legislation or executive action were revealed to be needed as a result of these reviews; examining the extent to which the members appointed to these panels represented the greatest possible diversity in philosophy and approach;

c) they would encourage more widespread discussion of questions related to the training of educational personnel. We would hope that the document prepared by a panel would be something of the

nature of an unofficial White Paper; that the panel would examine issues, interpret evidence, provide explanations for its positions, and suggest alternatives - all with such thoroughness that the product of its efforts would enable citizens generally to debate, in the most enlightened fashion, the central issues concerning the training of educational personnel.

There is no reason why government at any level, and particularly at the Federal level, need be remote from the people. We need suitable mechanisms to make decision-making processes in education accessible to all concerned citizens. And above all, the public in a democratic society needs to be informed about the issues.

* * * * *

The cost of establishing a panel is estimated to be approximately $35,000 to $40,000. Such a substantial outlay demands justification.

There are a number of Federal programs concerned with the training of educational personnel. Many have annual appropriations in excess of five million dollars.

Most are authorized over a five-year period. Set against the expenditure of $25 million for a single program, the cost of establishing a policy panel can represent a wise investment, if such a device contributes significantly to the more effective use of program funds.

Whether a policy panel will make such a contribution has yet to be demonstrated. It is for this reason that we have recommended that the panel idea be tried on a pilot basis before consideration is given to more widespread adoption.

Over the past decade the Federal Government has supported a variety of efforts designed to explore ways to bring about improvements in American education.

It is no less important that efforts also be made to explore ways to bring about improvements in those aspects of the political process which so deeply affect the future of the nation's educational system. We offer the policy panel proposal as one means to bring about such improvements.

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